

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LINDSAY LEVINSON,

Plaintiff,

- against -

LASSO MARKETING, INC. and IQVIA, INC.,

Defendants.

No. 1:24-cv-09202 (JLR)

**DECLARATION OF JEREMIAH
IADEVAIA IN SUPPORT OF
MOTION FOR LEAVE TO
AMEND COMPLAINT**

JEREMIAH IADEVAIA affirms the following under penalty of perjury:

1. I am a partner at Vladeck, Raskin and Clark, P.C. and counsel for the Plaintiff Lindsay Levinson (“Levinson” or “Plaintiff”) in this case against Defendants Lasso Marketing, Inc. (“Lasso”) and IQVIA, Inc. (“IQVIA”) (collectively, “Defendants”). I am an attorney admitted to practice in good standing in New York and this Court.

2. I submit this affirmation in support of Plaintiff’s Motion for Leave to Amend her Complaint.

3. Plaintiff filed this action on December 2, 2024 to remedy Defendants’ discrimination and retaliation in violation of the Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. (“Title VII”); the New York State Human Rights Law, N.Y. Exec. Law § 296 et seq. (the “NYSHRL”); and the Administrative Code of the City of New York § 8-107 et seq. (the “NYCHRL”). (Complaint (“Compl.”) ¶¶ 1–3, Dkt. 1)

4. As permitted under Federal Rule of Civil Procedure 15(a)(1)(A), Plaintiff filed as of right an Amended Complaint on December 23, 2024. (Dkt. 9) Following the filing of the Amended Complaint, Defendants filed an Answer on February 14, 2025. (Dkt. 14)

5. A copy of Plaintiff's proposed Second Amended Complaint with proposed additions and changes redlined is attached hereto as Exhibit 1. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff's proposed Second Amended Complaint without any redlines.

6. Before making this motion, Plaintiff provided a copy of her proposed Second Amended Complaint to Defendants and asked whether Defendants would consent to amendment. Although Defendants were already aware of the facts underlying Plaintiff's proposed amendment, Defendants refused to consent to amendment. Defendants did not provide a basis for their refusal.

7. This case is still in the early stages of discovery. The parties exchanged some initial discovery requests but have not exchanged documents beyond those required by the Court's Pilot Discovery Protocols for Counseled Employment Cases. The parties have not conducted any depositions.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 17, 2025

/s/ Jeremiah J. Iadevaia
JEREMIAH J. IADEVAIA